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VIA EMAIL

June 22, 2023

Peter J. Curtin
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Re: ***The NOCO Company v. Aukey Technology Co., Ltd., et al.,***
U.S. District Court, Northern District of Ohio, Case No. 1:20-cv-02322

Pete:

Please provide us with an update as to the status of Defendants Aukey Technology Co., Ltd., Shenzhenshi Jiangyun Shangmaoyouxiangongsi, and Wodeshijikeji Shenzhen Youxiangongsi (collectively, the “**Defendants**”) forthcoming document production. In the Parties’ March 15, 2023 joint status update, Defendants represented that their United States counsel had begun reviewing documents for “privilege and responsiveness.” See ECF # 44. Additionally, in the Parties’ April 5, 2023 joint motion to extend discovery deadlines and during the May 3, 2023 status conference with the Court, Defendants also represented that documents were being reviewed for a forthcoming document production.

As you know, Plaintiff The NOCO Company served Defendants with Requests for Production, Interrogatories, and Requests for Admissions on January 20, 2022. Despite promising that documents would be forthcoming and agreeing to ESI search terms, Defendants have not produced any documents.

Accordingly, please advise as to the review status and provide a date certain as to when we can expect a document production or provide your availability so that we can meet and confer pursuant to Local Rule 37.1(a)(1).

THIS LETTER DOES NOT PURPORT TO BE A COMPLETE STATEMENT OF THE LAW, THE FACTS, MY CLIENT’S RIGHTS OR POTENTIAL CLAIMS, AND THIS LETTER IS WITHOUT PREJUDICE TO MY CLIENT’S LEGAL AND EQUITABLE RIGHTS, ALL OF WHICH ARE EXPRESSLY RESERVED.

Sincerely,

JON J. PINNEY

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